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Automobile Insurance Company

8
9 UNITED STATES DISTRICT COURT

10 SOUTHERN DISTRICT FOR THE DISTRICT OF NEVADA

11 DRAGAN VOJINOVIC,

12 Plaintiff,

Case No: 2:13-cv-02232-APG-NJK

13 vs.

14 STATE FARM MUTUAL AUTOMOBILE
 15 INSURANCE COMPANY; and DOES I - V,
 and ROES VI- X, inclusive,

16 Defendant.

17 **STIPULATION AND ORDER REGARDING MOTIONS IN LIMINE FILED BY PLAINTIFF**
 18 **AGREEMENTS REGARDING PLAINTIFF'S NO. 6 (DOC #25)**

19 IT IS HEREBY STIPULATED by and between JESSIE SBAIH, ESQ., of JESSIE SBAIH &
 20 ASSOCIATES, attorneys for Plaintiff, and RYAN L. DENNETT, ESQ., of the law firm of
 21 DENNETT WINSPEAR, LLP, that counsel conferred in compliance with this Court's Order (Doc
 22 #34) and agree that with regard to Plaintiff's Motion in Limine No. 6 (within Plaintiff's Omnibus
 23 Motion in Limine (DOC #25)): Defense counsel shall refrain to making the following statements
 24 as enumerated in the subject motion and excluded by Lioce v. Cohen, 124 Nev. 1, 174 P.3d 970
 25 (2008): (1) Stating that "at some point we must say, enough is enough;" (2) Stating that "people
 26 must stop wasting taxpayer money and jurors' valuable time on cases like this;" (3) Stating that a
 27 case was frivolous and was responsible for the decline of the legal profession's reputation; (4)
 28 "This is a case where the plaintiffs are trying to get something for nothing;" (5)"It's cases like this

1 that make people skeptical and distrustful of lawyers;" (6) "The only way that people and their
 2 chiropractors will stop bringing these cases is if juries start saying no, enough is enough." (7) ".
 3 .when a jury speaks through its verdict, it's a reflection of society's values and beliefs and what
 4 justice is or should be;" (8) Stating a personal opinion as to the justness of a cause; (9) Violating
 5 the "golden rule" by inviting jurors to consider a hypothetical situation involving the jurors'
 6 children; and (10) Stating it was his personal crusade to defend his clients because of the sheer
 7 frivolity of the cases. Id. Defense counsel objects to the remainder of Plaintiff's Motion in Limine
 8 No. 6.

9
 10 DATED this 24th day of November, 2015.

11 **JESSE SBAIH & ASSOCIATES**

11 **DENNETT WINSPEAR, LLP**

12
 13 By: /s/ Jesse M. Sbaih
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 23 **Mutual Automobile Insurance Company**

24 **ORDER**

25 **IT IS SO ORDERED:**

26 **DATED:** 11/25/15

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 UNITED STATES DISTRICT JUDGE